

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

IN RE:

HERIBERTO RODRIGUEZ, JR. and	:	Chapter 13
MICHELLE K. RODRIGUEZ	:	
	:	
Debtors	:	Case No. 14-11529-WHD
	:	

NOTICE OF REQUIREMENT OF RESPONSE TO  
DEBTORS' POST-CONFIRMATION MODIFICATION OF  
CHAPTER 13 PLAN TO REDUCE BASE AND TO FORGIVE ANY  
DELINQUENCY IN THE BASE AMOUNT;  
AND REQUEST FOR ITS APPROVAL;  
OF DEADLINE FOR FILING RESPONSE; and OF HEARING

NOTICE IS HEREBY GIVEN that on April 9, 2015 Debtor **DEBTORS' POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN TO REDUCE BASE AND TO FORGIVE ANY DELINQUENCY IN THE BASE AMOUNT, AND REQUEST FOR ITS APPROVAL** seeking approval of a plan modification, said plan modification is attached hereto. **If you object, then on or before May 5, 2015** you (or your attorney, if you have one) MUST:

1. **File** with the court a written response/objection, explaining specifically why the plan modification should not be granted, by mailing or delivering it to the following address:

**PLACE OF FILING:** Clerk of Court, United States Bankruptcy Court  
18 Greenville Street  
PO Box 2328  
Newnan, Georgia 30264

or by filing electronically online at <http://ecf.ganb.uscourts.gov> (registered users) or at <http://pacer.psc.uscourts.gov> (non-registered users). Responses filed electronically may be filed up to 11:59:59 PM on the deadline.

If you mail your response to the Clerk for filing, you must mail it early enough so that the Clerk will actually receive it on or before the date stated above.

2. **Mail or deliver** a copy of your written response to the Debtor's attorney at the address stated below. You must attach a Certificate of Service to your written response stating when, how, and on whom (including addresses) you served the response.

3. **Advocate** your position at the hearing to be held at 2<sup>nd</sup> Floor Courtroom, Lewis R. Morgan Federal Building, 18 Greenville Street, Newnan, Georgia **at 9:25 AM on May 28, 2015.**

If you or your attorney fail to object as set forth above, Debtor's plan modification will be granted.

Dated: April 9, 2015  
\_\_\_\_\_  
/s/  
Alex J. Dolhancyk, Esquire

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

**IN RE:**

<b>HERIBERTO RODRIGUEZ, JR. and</b>	:	<b>Chapter 13</b>
<b>MICHELLE K. RODRIGUEZ</b>	:	
	:	
<b>Debtors</b>	:	<b>Case No. 14-11529-WHD</b>
	:	

**DEBTORS' POST-CONFIRMATION MODIFICATION OF  
CHAPTER 13 PLAN AND REQUEST FOR ITS APPROVAL**

Debtors propose to modify the confirmed Chapter 13 plan in this case as set forth below and request that this modification be approved.

**MODIFICATION OF PLAN**

Debtors modify the Chapter 13 plan previously confirmed by the Court as follows:

**Due to a period of unemployment, Debtors propose that the base amount payable to creditors be reduced or forgiven in order to comply with the 60 month Applicable Commitment Period as defined in Debtors' confirmed plan.**

All other provisions of Debtor's plan shall remain the same.

Dated: April 9, 2015

\_\_\_\_\_  
/s/  
Heriberto Rodriguez, Debtor

\_\_\_\_\_  
/s/  
Michelle Rodriguez, Debtor

/s/

Alex J. Dolhancyk, Esquire  
The Dolhancyk Law Firm, P.C.  
522 Flint Trail, Suite B  
Jonesboro, GA 30236-1316  
Telephone: 678.619.1728  
E-mail: dolhancyklaw@gmail.com